

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. :

NOTICE OF MOTION
23 Cr. 603 (ALC)

ROBERT RUMPH, :

Defendant. :

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PLEASE TAKE NOTICE, that based on the annexed affirmation of **Sylvie Levine, Esq.**, and documents incorporated therein, the defendant, **Robert Rumph**, will move this Court, before the **Honorable Andrew L. Carter, Jr.**, United States District Judge for the Southern District of New York, at a time to set by the Court, for an order suppressing all evidence obtained in violation of the Fourth Amendment to the United States Constitution as a direct or derivative result of the warrantless and unreasonable seizure of Mr. Rumph and search of his car on October 1, 2023, and the fruits of those unlawful actions and for an order controverting the search warrants. In the alternative, Mr. Rumph requests an evidentiary hearing on this motion and any further relief as this Court deems just and proper.

Dated: New York, New York
May 28, 2024

Respectfully submitted,

TAMARA L. GIWA, ESQ.
Federal Defenders of New York
52 Duane Street, 10th floor
New York, NY 10007
By: Sylvie Levine
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DAMIAN WILLIAMS
United States Attorney
Southern District of New York
New York, NY 10007
By: Will Kinder
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